

BOIES, SCHILLER & FLEXNER LLP
 RICHARD J. POCKER (NV Bar No. 3568)
 300 South Fourth Street, Suite 800
 Las Vegas, NV 89101
 Telephone: (702) 382-7300
 Facsimile: (702) 382-2755
 rpocker@bsfllp.com

BOIES, SCHILLER & FLEXNER LLP
 WILLIAM ISAACSON (*pro hac vice*)
 KAREN DUNN (*pro hac vice*)
 5301 Wisconsin Ave, NW
 Washington, DC 20015
 Telephone: (202) 237-2727
 Facsimile: (202) 237-6131
 wisaacson@bsfllp.com
 kdunn@bsfllp.com

BOIES, SCHILLER & FLEXNER LLP
 STEVEN C. HOLTZMAN (*pro hac vice*)
 KIERAN P. RINGGENBERG (*pro hac vice*)
 1999 Harrison Street, Suite 900
 Oakland, CA 94612
 Telephone: (510) 874-1000
 Facsimile: (510) 874-1460
 sholtzman@bsfllp.com
 kringgenberg@bsfllp.com

Attorneys for Oracle USA, Inc., Oracle
 America, Inc., and Oracle International
 Corporation

MORGAN, LEWIS & BOCKIUS, LLP
 THOMAS S. HIXSON (*pro hac vice*)
 KRISTEN A. PALUMBO (*pro hac vice*)
 One Market Street
 Spear Street Tower
 San Francisco, CA 94105
 Telephone: (415) 442-1000
 Facsimile: (415) 442-1001
 thomas.hixson@morganlewis.com
 kristen.palumbo@morganlewis.com

DORIAN DALEY (*pro hac vice*)
 DEBORAH K. MILLER (*pro hac vice*)
 JAMES C. MAROULIS (*pro hac vice*)
 ORACLE CORPORATION
 500 Oracle Parkway, M/S 5op7
 Redwood City, CA 94070
 Telephone: (650) 506-4846
 Facsimile: (650) 506-7114
 dorian.daley@oracle.com
 deborah.miller@oracle.com
 jim.maroulis@oracle.com

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

ORACLE USA, INC., a Colorado corporation;
 ORACLE AMERICA, INC. a Delaware
 corporation; and ORACLE INTERNATIONAL
 CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada corporation;
 SETH RAVIN, an individual,

Defendants.

Case No. 2:10-cv-00106-LRH-PAL

**PLAINTIFFS ORACLE'S MOTION
 TO SEAL THEIR REPLY RE
 MOTION FOR PREJUDGMENT
 INTEREST**

Judge: Hon. Larry R. Hicks

Pursuant to the Stipulated Protective Order governing confidentiality of documents entered by the Court on May 21, 2010, Dkt. 55 (“Protective Order”), and Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Plaintiffs Oracle USA, Inc., Oracle America, Inc., and Oracle International Corporation (together “Oracle” or “Plaintiffs”) respectfully request that the Court order the Clerk of the Court to file under seal an unredacted copy of Oracle’s Reply in Support of Motion for Prejudgment Interest (“Reply”) and Exhibit A to the Declaration of Kieran P. Ringgenberg in Support of the Reply (“Ringgenberg Declaration”). Unredacted copies of the Reply and Exhibit A will be individually lodged under seal with the Court on January 11, 2016.

Sealing of the unredacted Reply and Exhibit A is requested because the redacted portions contain information that Rimini Street, Inc. and Seth Ravin (collectively the “Defendants”) have designated as “Confidential Information” under the terms of the Protective Order. The Protective Order states, “Counsel for any Designating Party may designate any Discovery Material as ‘Confidential Information’ and ‘Highly Confidential Information – Attorneys’ Eyes Only’ under the terms of this Protective Order only if such counsel in good faith believes that such Discovery Material contains such information and is subject to protection under Federal Rule of Civil Procedure 26(c). The designation by any Designating Party of any Discovery Material as ‘Confidential Information’ or ‘Highly Confidential Information – Attorneys’ Eyes Only’ shall constitute a representation that an attorney for the Designating Party reasonably believes there is a valid basis for such designation.” Protective Order ¶ 2.

For sealing requests relating to non-dispositive motions, such as this, the presumption of public access to court filings may be overcome by a showing of good cause under Rule 26(c). *See Pintos v. Pacific Creditors Ass’n*, 605 F.3d 665, 678 (9th Cir. 2010); *Kamakana v. Honolulu*, 447 F.3d 1172, 1179 (9th Cir. 2006). Defendants have identified the information redacted in the Reply as well as Exhibit A as Confidential and therefore have represented that good cause exists for sealing those portions of the documents. This is a sufficient showing of good cause to permit a sealing order on a non-dispositive motion. *See, e.g., Pac. Gas & Elec. Co. v. Lynch*, 216 F. Supp. 2d 1016, 1027 (N.D. Cal. 2002).

DOCUMENTS DESIGNATED BY RIMINI AS CONFIDENTIAL

Rimini has designated the following documents cited or referred to in Oracle's Reply and proposed order as Confidential:

EX. NO.	DESCRIPTION	CONF. DESIGN.
A	Offer of Judgment Pursuant to Fed. R. Civ. P. 68 dated August 24, 2010.	Confidential

For the foregoing reasons, Oracle respectfully requests that the Court find that good cause exists to file under seal the unredacted copies of the Reply and Exhibit A, and to issue an order sealing the same.

DATED: January 8, 2016

BOIES SCHILLER & FLEXNER LLP

By: /s/ Kieran P. Ringgenberg
 Kieran P. Ringgenberg
 Attorneys for Plaintiffs
 Oracle USA, Inc., Oracle America, Inc.,
 and Oracle International Corp.

CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of January, 2016, I electronically transmitted the foregoing PLAINTIFFS ORACLE'S MOTION TO SEAL THEIR REPLY RE MOTION FOR PREJUDGMENT INTEREST to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to all counsel in this matter; all counsel being registered to receive Electronic Filing.

DATED: January 8, 2016

Respectfully submitted

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Kieran P. Ringgenberg
Kieran P. Ringgenberg

Attorneys for Plaintiffs Oracle USA, Inc.,
Oracle America, Inc. and Oracle International
Corporation